

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,  Debtors.<sup>1</sup></div>	<div>PROMESA Title III  No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,  Debtor.</div>	<div>PROMESA Title III  No. 17 BK 3567-LTS  <b>Re ECF Nos.: 12569, 12570, 12964</b></div>
<div>THE COMMONWEALTH OF PUERTO RICO and PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,  Movants,  -v-  AMBAC ASSURANCE CORPORATION,  Respondent.</div>	<div>PROMESA Title III  No. 17 BK 3283-LTS (Jointly Administered)</div>

**DECLARATION OF MICHAEL A. FIRESTEIN REGARDING REPLY IN SUPPORT  
OF MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT BOARD  
PURSUANT TO BANKRUPTCY CODE SECTIONS 105(A) AND 362 FOR ORDER  
DIRECTING AMBAC TO WITHDRAW COMPLAINT**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

I, Michael A. Firestein, state and declare as follows:

1. I am a partner of Proskauer Rose LLP, attorneys for the Financial Oversight and Management Board for Puerto Rico. I submit this Declaration based upon personal knowledge and review of the Puerto Rico government's official documents in respect of *Motion of Financial Oversight and Management Board for Puerto Rico Pursuant to Bankruptcy Code Sections 105(a) and 362 for an Order Directing Ambac to Withdraw Complaint* [ECF No. 12569] (the "Motion") and memorandum of law [ECF No. 12570] (the "MOL").

2. Attached hereto as Exhibit A is a true and correct copy of the Escrow Agreement, dated September 22, 2011, entered into between Metropistas and HTA in connection with the Concession Agreement (as defined in the Motion).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration was executed on May 27, 2020 in Los Angeles, California.

/s/ Michael A. Firestein  
Michael A. Firestein